

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 2, 2012

MR CRAIG R ECKBERG
SR MANAGER ENVIRONMENTAL BUSINESS
NRG TEXAS POWER LLC
1201 FANNIN ST
HOUSTON TX 77002-6929

Re: Permit Application
Permit Number: 99181
WA Parish Electric Generating Station
Thompsons, Fort Bend County
Regulated Entity Number: RN100888312
Customer Reference Number: CN603207218

RECEIVED
12 FEB 15 PM 4:09
AIR PERMITS SECTION
6PD-R

Dear Mr. Eckberg:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

Mr. Craig R. Eckberg

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February 2, 2012

Re: Permit Number 99181

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Tan Nguyen, P.E. at (512) 239-3445.

Sincerely,



Bridget C. Bohac

Chief Clerk

Office of the Chief Clerk

Texas Commission on Environmental Quality

BB/TN/tn

Enclosures

cc: Air Section Manager, Region 12 - Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Number: 170995

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 99181

APPLICATION AND PRELIMINARY DECISION. NRG Texas Power LLC, 1201 Fannin Street, Houston, Texas 77002-6929, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 99181, which would authorize installation of a gas turbine at the WA Parish Electric Generating Station located at 2500 Y. U. Jones Road, Thompsons, Fort Bend County, Texas 77481. This application was submitted to the TCEQ on October 25, 2011. The proposed facility will emit the following contaminants: particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, carbon monoxide, nitrogen oxides, sulfur dioxide, sulfuric acid, and organic compounds including but not limited to methane.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ central office, the TCEQ Houston regional office, and at the George Memorial Branch Library, 1001 Golfview Drive, Richmond, Fort Bend County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing. **You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.**

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who**

submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=29.478055&lng=-95.635555&zoom=13&type=r>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from NRG Texas Power LLC at the address stated above or by calling Mr. Craig R. Eckberg, Senior Manager, Environmental Business at (713) 537-2146.

Notice Issuance Date: February 2, 2012

Example B

Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

NRG Texas Power LLC, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of Proposed Air Quality Permit Number 99181, which would authorize installation of a gas turbine at the WA Parish Electric Generating Station located at 2500 Y. U. Jones Road, Thompsons, Fort Bend County, Texas 77481. Additional information concerning this application is contained in the public notice section of this newspaper.

3"
minimum

← Minimum 2 column widths or 4 inches →

Public Notice Checklist
Notice of Application and Preliminary Decision for an Air Quality Permit
(2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter

Publish *Notice of Application and Preliminary Decision for an Air Quality Permit* in the same newspaper(s) in which you published *Notice of Receipt of Intent to Obtain Permit* for this application.

- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.
- Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper

Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.

First day of newspaper publication

Review published newspaper notice for accuracy. If errors, contact Air Permits Division.

Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.

It is recommended that the signs from the first notice be in place and be legible and visible until 30 days after publication of the *Notice of Application and Preliminary Decision* (either English or alternative language notice, whichever is later).

Within 10 business days after date of publication

Mail original newspaper clippings showing publication date and newspaper name to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.

Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of affidavits to persons listed on *Notification List*.

Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form to persons listed on *Notification List*.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Air Permit

Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter).
- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. *Example B* must be published in the same issue of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- *Example B* must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths**. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least **12 square inches** with the shortest side of at least **3 inches**.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold, italics**). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).
- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit*. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the *Public Notice Verification Form (Form TCEQ-20244)* indicating your compliance with the requirements regarding publication in an alternative

language. **This form is available at**
www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.

- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period will last at least **30 calendar days after publication of the last notice.**
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the TCEQ Office of the Chief Clerk within **10 business days** after the date of publication.
- You must submit an **original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the

Office of the Chief Clerk within 30 calendar days after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.

- You must submit the **Public Notice Verification Form (Form TCEQ-20244)** to the Office of the Chief Clerk within 10 business days of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The original affidavits of publication, **Public Notice Verification Form**, and original newspaper clippings of the published notices must be mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time**, the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

It is recommended that the signs that were put in place prior to publication of the first notice remain in place and be legible and visible until 30 days after publication of the *Notice of Application and Preliminary Decision* (either English or alternative language notice, whichever is later).

Application in a Public Place

- You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the *Public Notice Verification Form (Form TCEQ-20244)* within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: NRG Texas Power LLC

Permit No.: 99181

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the _____
(title of newspaper representative)

of the _____; that said newspaper is generally circulated
(name of newspaper)

in _____, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

(newspaper representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____,
to certify which witness my hand and seal of office.

(Seal)

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: NRG Texas Power LLC

Permit No.: 99181

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS §

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the _____
(title of newspaper or publication representative)

of the _____; that said newspaper or publication is generally circulated
(name of newspaper or publication)

in _____, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

_____.

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____.

to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

(Seal)

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Air
Air Permits Division, MC-163
Mr. Tan Nguyen, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Houston Regional Office
5425 Polk St Ste H
Houston, Texas 77023-1452

Special Conditions

Permit Number 99181

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in the attached table.
2. This permit authorizes a General Electric 7EA natural gas-fired combustion turbine generator (CTG), Emission Point Number (EPN) CTSC, and associated fugitive emissions. The CTG is rated at a maximum base-load electric output of approximately 80 megawatts. This permit also authorizes the planned maintenance, startup, and shutdown (MSS) activities associated with the CTG (EPN CTSC).

Federal Applicability

3. These facilities shall comply with applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources (NSPS), Title 40 Code of Federal Regulations (40 CFR) Part 60:
 - A. Subpart A: General Provisions.
 - B. Subpart KKKK: Standards of Performance for Stationary Combustion Turbines.
4. These facilities shall comply with applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63:
 - A. Subpart A: General Provisions.
 - B. Subpart YYYYY: National Emission Standard for Hazardous Air Pollutants for Stationary Combustion Turbines.

Emission Standards and Operating Specifications

5. Emissions from the CTG (EPN CTSC) shall not exceed the following, except during periods of planned MSS activities:
 - A. The concentration of nitrogen oxides (NO_x) shall not exceed 5 parts per million by volume dry (ppmvd) corrected to 15 percent oxygen (O_2), on a one-hour rolling average.

- B. The concentration of carbon monoxide (CO) shall not exceed 25 ppmvd corrected to 15 percent O₂, on a one-hour rolling average.
- C. The concentration of volatile organic compounds (VOC) shall not exceed 2 ppmvd corrected to 15 percent O₂, on a one-hour average.
- 6. The CTG is limited to operating 1,500 hours on a 12-month rolling period.
- 7. Fuel for the CTG is limited to pipeline-quality natural gas containing no more than 5 grains total sulfur per 100 dry standard cubic feet (dscf) on an hourly basis and 0.5 grain total sulfur per 100 dscf on an annual basis. The sulfur content shall be monitored pursuant to 40 CFR 60 Subpart KKKK.

Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ) or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel-fired in the CTG or shall allow air pollution control agency representatives to obtain a sample for analysis.

- 8. Except during planned MSS activities, the opacity shall not exceed five percent averaged over a six-minute period from the stack (EPN CTSC). During MSS activities, the opacity shall not exceed 15 percent. Each determination shall be made by first observing for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission point. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours of observing the visible emissions for that emission point using 40 CFR Part 60, Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. Observations shall be performed and recorded quarterly. If the opacity exceeds five percent during normal operations or 15 percent during MSS activities, corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one week of first observation.

Planned Maintenance, Startup, and Shutdown

- 9. The holder of this permit shall minimize emissions during planned MSS activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility.
- 10. This permit authorizes planned combustion optimization maintenance activities.

11. This permit authorizes planned startup and shutdown activities. Emissions during planned startup and shutdown activities will be minimized by limiting the duration of operation in planned startup and shutdown mode as follows:
 - A. A startup begins with the ignition of the fuel in the combustion system, as detected by the primary flame scanner, and ends when the CTG achieves the steady premix mode of operation. A planned startup for the CTG is limited to one hour.
 - B. A shutdown begins when the CTG transfers from the premix mode of operation to a lean-lean mode of operation with the intent of shutting the unit down. A planned shutdown for each CTG is limited to one hour.

Initial Determination of Compliance

12. Safe sampling ports and platforms shall be incorporated into the design of all exhaust stacks according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director.
13. The permit holder shall perform stack sampling and other testing as required to establish the actual quantities of air contaminants being emitted into the atmosphere from EPN CTSC. In addition, the permit holder shall perform stack sampling and other testing if requested by the TCEQ Regional Director to establish the actual quantities of air contaminants being emitted into the atmosphere from EPN CTSC. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Test Methods or by other equivalent methods approved by the TCEQ Regional Director.

Fuel sampling using the methods and procedures of 40 CFR § 60.4415 may be conducted in lieu of stack sampling for sulfur dioxide (SO₂). If fuel sampling is used, compliance with NSPS Subpart KKKK, SO₂ limits shall be based on 100 percent conversion of the sulfur in the fuel to SO₂. Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling. The TCEQ Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling.

The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

- A. The TCEQ Regional Office shall be contacted as soon as testing is scheduled but not less than 30 days prior to sampling to schedule a pretest meeting. The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.
- (6) Procedure used to determine turbine loads during and after the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for NSPS testing which must have EPA approval shall be submitted to the TCEQ Air Permits Division.

- B. Air contaminants and diluents to be sampled and analyzed include (but are not limited to) NO_x, CO, VOC, SO₂, sulfuric acid, opacity, particulate matter (filterable and condensable), and O₂. Fuel sampling using the methods and procedures of 40 CFR § 60.4415 or 40 CFR § 60.4365(a) may be conducted for monitoring SO₂.
- C. The turbine shall be tested at the maximum load for the atmospheric conditions which exist during testing. The tested turbine load shall be identified in the sampling report. The permit holder shall present at the pretest meeting the manner in which stack sampling will be executed in order to demonstrate compliance with emission standards found in 40 CFR Part 60, Subpart KKKK.
- D. Sampling as required by this condition shall occur within 60 days after achieving the maximum production rate at which the turbine will be operated, but no later than 180 days after initial startup of each unit. Additional sampling may be required by the TCEQ or EPA.

- E. Within 60 days after the completion of the testing and sampling required herein, two copies of the sampling reports shall be distributed as follows:
- (1) One copy to the TCEQ Air Permits Division in Austin.
 - (2) One copy to the TCEQ Regional Office.

Continuous Determination of Compliance

14. The holder of this permit shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) to measure and record the concentrations of NO_x, CO, and diluents (O₂ or carbon dioxide) from the exhaust stack (EPN CTSC).
- A. Monitored NO_x and CO concentrations shall be corrected and reported in dimensional units corresponding to the emission rate and concentration limits established in this permit.
 - B. The CEMS data shall be used to demonstrate compliance with the NO_x and CO emission limitations in Special Condition No. 5 and the MAERT.
 - (1) A valid hour consists of a minimum of 4, and normally 60, approximately equally-spaced data points.
 - (2) Excess NO_x and CO emissions caused by malfunctions are excluded.
 - (3) Excess NO_x emissions during initial or other major dry low NO_x burner tuning sessions are excluded. Major tuning sessions are scheduled events, and would occur after the completion of initial construction, a combustor change-out, a major repair, maintenance to a combustor, or other similar circumstances.
 - C. The NO_x/diluent CEMS shall be operated according to the methods and procedures as set out in 40 CFR § 60.4345.
 - D. The CO CEMS shall meet the appropriate quality assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Each CO monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is not required once every four quarters if four successive quarterly CGA have been conducted for that four-quarter period. An

equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur at least two months apart.

- E. Reporting of monitoring data for demonstrating compliance with NSPS Subpart KKKK and this permit shall be conducted in accordance with the methods and procedures as set out in 40 CFR § 60.4380(b).
 - F. Compliance with the NO_x/diluent continuous emissions monitor requirements above can be demonstrated by meeting the requirements of 40 CFR Part 75 provided that the permit holder demonstrates compliance with applicable NSPS regulations.
 - G. The TCEQ Regional Office shall be notified at least 21 days prior to any required relative accuracy test audit in order to provide them the opportunity to observe the testing.
15. The permit holder shall install, calibrate, maintain, and operate a continuous monitoring system to monitor and record the average hourly natural gas consumption of the CTG. The permit holder shall comply with the initial certification and quality assurances as specified in 40 CFR Part 75, Appendix D.

Recordkeeping Requirements

16. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, EPA, or any air pollution control agency with jurisdiction:
- A. A copy of this permit.
 - B. Permit application dated October 25, 2011, and subsequent representations submitted to the TCEQ.
 - C. A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 13 to demonstrate initial compliance.
 - D. Stack sampling results or other air emissions testing (other than CEMS data) that may be conducted on units authorized under this permit after the date of issuance of this permit.

17. The following information shall be maintained by the holder of this permit in a form suitable for inspection for a period of five years after collection and shall be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction:
- A. The CEMS data of NO_x , CO , and O_2 emissions from EPN CTSC to demonstrate compliance with the emission rates listed in the MAERT and Special Condition No. 5.
 - B. Raw data files of all CEMS data including calibration checks, adjustments, and maintenance performed on these systems in a permanent form suitable for inspection.
 - C. Records of monthly hours of operations to demonstrate compliance with Special Condition No. 6.
 - D. Records of sulfur analysis of natural gas pursuant to Special Condition No. 7.
 - E. Records of visible emission/opacity observations and date and description of corrective actions taken pursuant to Special Condition No. 8.
 - I. Records of planned MSS activities, including duration of planned startup/shutdown periods, pursuant to Special Condition Nos. 10-11.

Reporting

18. The holder of this permit shall submit to the TCEQ Regional Office and the Air Enforcement Branch of EPA in Dallas reports as described in 40 CFR § 60.7. Such reports are required for each emission unit which is required to be continuously monitored pursuant to this permit.

Date:



Emission Sources - Maximum Allowable Emission Rates

Permit Number 99181

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
CTSC	GE 7EA (~ 80 MW) (5)	NO _x	20.20	16.95
		NO _x (MSS) (6)	88.00	--
		CO	61.50	56.25
		CO (MSS) (6)	450.00	--
		VOC	2.02	2.52
		VOC (MSS) (6)	15.50	--
		SO ₂ (7)	1.51	0.85
		PM (7)	12.50	8.13
		PM ₁₀ (7)	12.50	8.13
		PM _{2.5} (7)	12.50	8.13
		H ₂ SO ₄ (7)	0.53	0.30
NGFUG	Natural Gas Fugitives (8)	VOC	0.24	1.05

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- NO_x - total oxides of nitrogen
- SO₂ - sulfur dioxide
- PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
- PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
- PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- CO - carbon monoxide
- H₂SO₄ - sulfuric acid
- MSS - (planned) maintenance, startup, and shutdown

Emission Sources - Maximum Allowable Emission Rates

- (4) Compliance with annual emission limits (tons per year [tpy]) is based on a 12-month rolling period.
- (5) The tpy emission limit for this facility includes emissions from the facility during both normal operations and planned MSS activities.
- (6) The MSS pounds per hour (lbs/hr) emission limits apply only during each clock hour that includes one or more minutes of MSS activities. During all other clock hours, the normal operations lbs/hr emission limits apply.
- (7) The lbs/hr emission limit for this facility includes emissions from the facility during both normal operations and planned MSS activities.
- (8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: _____